

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SUPPRESSED

FILED

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM A. WHITE,

Defendant.

SEP - 3. 2020

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

4:20CR501 AGF/NCC

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term:

(a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(a));

(b) "sexually explicit conduct" to mean actual or simulated

(i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C.

§ 2256(2)(A)); and

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6)).

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(B) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. § 2256(8)).

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about January 13, 2010, and April 6, 2010, in the Eastern District of Missouri, and elsewhere,

WILLIAM A. WHITE

the Defendant herein, did knowingly distribute and/or receive material that contained image files of child pornography using any means and facility of interstate and foreign commerce, to wit the Defendant knowingly distributed and/or received image files of child pornography via the internet, to include but not limited to the following:

- a. An image entitled "files\039.jpg" depicting a female minor who appears to be under the of twelve years with her hand on her vagina in an act of masturbation and in a lascivious display of her genitals,
- b. An image entitled "files\1120[1].jpg" depicting a female minor who appears to be under the age of ten years with her mouth on a penis, and
- c. An image entitled "files\185928[1].jpg" depicting a female minor who appears to be under the age of ten years with her hand on a penis,

in violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT II

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. Between on or about April 6, 2020, and June 10, 2020, in Saint Louis County, Missouri within the Eastern District of Missouri and elsewhere,

WILLIAM A. WHITE,

the defendant herein, did use any facility and means of interstate commerce, and did knowingly attempt to persuade, induce, entice and coerce a minor under the age of eighteen, to engage in sexual activity for which any person could be charged with a criminal offense, to wit: the defendant, who was at least twenty-one years of age, communicated via the internet with a law enforcement officer, who the defendant believed to be a fourteen-year old juvenile and an adult woman providing an opportunity for sexual activity with her fourteen-year old daughter, and attempted to persuade, induce, entice and coerce such daughter, who the defendant believed was a minor under the age of eighteen, to engage in sexual activity, in violation of Missouri Revised Statutes Sections 566.034 (statutory rape in the second degree), 566.064 (statutory sodomy in the second degree), 566.071 (child molestation in the fourth degree) and 566.083 (sexual misconduct involving a child),

in violation of Title 18, United States Code, Section 2422(b).

A TRUE BILL.

FOREPERSON

JEFFREY B JENSEN
United States Attorney

JILLIAN S. ANDERSON, #53918(MO)
Assistant United States Attorney
jillian.anderson@usdoj.gov